

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

| | | |
|-------------------------------|---|------------------|
| ROBERT WOOD, et. al. |) | |
| |) | |
| Plaintiffs, |) | |
| |) | |
| v. |) | Civil Action No. |
| |) | 04-10015-WGY |
| UNITED STATES POSTAL SERVICE, |) | |
| |) | |
| Defendant. |) | |
| |) | |

JOINT RULE 16.1 STATEMENT

The parties in this action submit the following Joint Statement pursuant to Local Rule 16.1 and the Court's Order of March 11, 2004:

1. **Proposed Discovery Plan:**

- a. Automatic disclosure statements and discovery shall be served on or before May 30, 2004.
- b. All interrogatories and request for production of documents shall be served by February 15, 2005;
- c. Any Amendments pursuant to Fed. R. Civ. P. 15 shall be made by October 1, 2004;
- d. All depositions shall be completed by May 15, 2005; and
- e. A final pretrial conference shall be scheduled after decisions are rendered on any outstanding pleadings not ruled upon.

2. **Number of Depositions**

a. The plaintiffs intends to depose the defendant by and through the operator of the vehicle involved in the accident as well as pursuant to Fed R. Civ. Pro. 30(b)(6). Moreover, the Plaintiff intend to depose all witnesses to the accident.

b. Defendant intends to depose the plaintiffs and any witnesses they identify as to their damages (the defendant may depose any fact witnesses that are no longer employees of the defendant).

Since no discovery has yet occurred, and automatic discovery is not complete greater specificity of all deponents is not possible at this time.

3. **Consent to Trial By Magistrate**

a. The plaintiffs will consent to a trial by magistrate in this case.

b. The defendant does consent to a trial by magistrate in this case.

4. **Proposed Schedule for Motions**

a. All dispositive motions are to be filed by May 15, 2005.

5. **Designation of Experts**

a. Expert witnesses shall be identified by the plaintiff by February 28, 2005.

b. If necessary, the opposing party shall have sixty days after February 28, 2005 to identify and provide expert interrogatories.

6. **Final PreTrial Conference**

a. The Final Pretrial Conference will be scheduled by the Court following all hearings on dispositive motions.

ROBERT WOOD

Respectfully submitted,

UNITED STATES POSTAL SERVICE,

By its Attorneys,

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